

SueSteib.041306

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
3 JACKSON DIVISION

4 OLIVIA Y., ET AL. PLAINTIFFS
5 VERSUS CIVIL ACTION NO. 3:04CV251LN
6 HALEY BARBOUR, ET AL. DEFENDANTS

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10 DEPOSITION OF DR. SUE STEIB

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16 Deposition Taken at the Instance of Plaintiffs
17 In the Offices of Bradley, Arant, Rose & White
18 Jackson, Mississippi
19 On April 13, 2006
20 Commencing at 8:45 a.m.

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22 REPORTED BY: CHERIE G. BOND, RMR
23 Mississippi CSR #1012

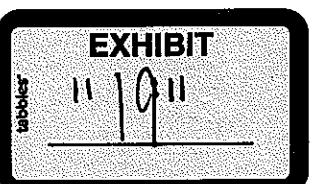
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Brandon, Mississippi 39047
(601) 936-4466

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1 APPEARANCES:

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3 MS. SUSAN LAMBAISE
Children's Rights
4 330 7th Avenue, Fourth Floor
New York, New York 10001

5 REPRESENTING PLAINTIFFS
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6 Q -- in Georgia, in New Jersey?

7 A CWLA has been contracted with states in
8 relation to lawsuits.

9 Q To provide expert testimony for the states?

10 A I know that they have provided expert
11 testimony.

12 Q Okay. And is it your understanding that
13 they have used in fact case record reviews as part of
14 that work, that expert work, in defending lawsuits?

15 A I know that there have been case record
16 reviews done. But -- I'm not privy to the -- I don't
17 know about the connection between the case record
18 review and the testimony.

19 Q Well, the case record review as part of
20 expert work for a state undergoing a lawsuit.

21 MS. RACHAL: Objection to form.

22 BY MS. LAMBIASE:

23 Q I'll correct it and ask the question more
24 clearly. You're aware that CWLA has provided expert
25 work for systems where there have been class action

24

1 lawsuits and part of that work has been case record
2 reviews to defend those lawsuits?

3 A Yes.

4 Q Okay. Georgia is one example. Do you know
5 of that example?

6 A I know of that example.

7 Q Okay. And, in fact, Charlene Ingram was one
8 of the people who you worked with on this case in
9 Mississippi. Right?

10 A Correct.

11 Q And she worked on one of the case record
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12 reviews in Georgia. Did you know that?

13 A That's correct.

14 Q Okay.

15 MS. LAMBIASE: Off the record.

16 (off Record)

17 MS. LAMBIASE: Ms. Steib, I'd like to talk
18 about your contract for a second so I'm going to hand
19 the court reporter a copy of what I believe to be your
20 contract. It's Bates Number Steib 000028 through 34
21 and ask that we mark it as 174.

22 (Exhibit 174 marked)

23 BY MS. LAMBIASE:

24 Q Do you have it in front of you?

25 A Yes.

25

1 Q Do you recognize what has been marked as
2 Exhibit 174?

3 A Yes.

4 Q Is that your contract with Mississippi
5 Department of Human Services, Department of Children
6 and Family Services?

7 A No.

8 Q It's not -- that's not the contract?

9 A It is our contract, but our contract was
10 with the Attorney General.

11 Q Okay. Okay. Thank you for clarifying that.
12 I appreciate that. So this is the copy of the
13 contract of the work to be performed by CWLA for the
14 State of Mississippi. Is that correct?

15 A It would appear to be.

16 Q This is what we got just for your
17 edification from the documents produced I guess from
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18 your files.

19 A Correct.

20 Q And I'll note just for the record that the
21 last page has Shay Bilchik the former president of
22 CWLA -- is that correct -- who signed it?

23 A He's still the president.

24 Q I'm sorry. He's still the president.

25 Thank. But I don't have a copy with the Attorney

26

1 General's office signature. But their is the copy
2 that was in your files. Is that correct?

3 A That's correct.

4 Q So this was the -- this was a contract
5 between and you the AG, your organization and the
6 Attorney General's office of the State of Mississippi.

7 A Yes.

8 Q Okay. Can you describe the work that was
9 contracted to be performed under this contract?

10 A We were asked to review the policies and the
11 procedures and the organization of DFCS.

12 Q okay.

13 A And with a particular focus on workload.

14 Q Okay. So the way it was presented to CWLA
15 was there a request to particularly emphasize
16 workload.

17 A Correct.

18 Q Okay. And how did that contact come about
19 as much as you know?

20 A The initial contact was with -- was with Bob
21 McKeagney as the CWLA representative, but I'm not sure
22 with whom he had contact.

23 Q Okay. Do you know whether it was somebody
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